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By ECF

Hon. Roanne L. Mann
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

**Re: Innovation Ventures, et al. v. Ultimate One Distributing Corp., et al. 12
Civ. 5354 (EDNY) (KAM) (RLM)**

Dear Judge Mann:

On behalf of Plaintiffs in the above-referenced matter, we write in response to your order dated May 1, 2013 regarding the Proposed Protective Order and the Proposed Order for Access to Disclosure and Discovery Material [Dkt. No. 551]. Pursuant to your instructions, we have revised the two proposed orders to clarify exactly how materials copied pursuant to a seizure order issued by this Court will be reviewed and disseminated to all Parties in this action.

In addition to the above clarifications, Plaintiffs have also made several additional changes to the Proposed Protective Order in response to suggestions by defendants. We have submitted both clean and redlined copies of the proposed orders for the Court's review and consideration.

Respectfully submitted,



Geoffrey Potter

Enclosures

cc: All counsel (via ECF)